

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRYAN ANTHONY REO,

Plaintiff,

v.

LUDIVINE JOAN CLAUDIA REYNAUD,

and

DOMINIQUE BILDE,

Defendants.

Case No. 1:22-cv-00510-JG

Hon. James S. Gwin

REO LAW, LLC

Bryan A. Reo (#0097470)

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Pro se Plaintiff

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Attorneys for Ludivine Joan Claudia Reynaud

**PLAINTIFF BRYAN A. REO'S BRIEF IN SUPPORT OF DEFENSE COUNSELS'
MOTION TO WITDRAW FROM REPRESENTATION OF
DEFENDANT LUDIVINE JOAN CLAUDIA REYNAUD**

NOW COMES Bryan A. Reo ("Plaintiff"), *pro se*, and hereby propounds upon Ludivine Joan Claudia Reynaud ("Reynaud") and this Honorable Court Plaintiff Bryan A. Reo's Brief in Support of Defense Counsels' Motion to Withdraw From Representation of Defendant Ludivine Joan Claudia Reynaud.

Defense Counsel entered their appearance on behalf of Defendant Ludivine Joan Claudia Reynaud on 5/23/2022 [ECF No. 6], filing an Answer on 6/6/2022 [ECF No. 9], and have now moved to withdraw from their representation of Ludivine Reynaud as of 6/13/2022 [ECF No. 11] on the basis that Defendant Ludivine Joan Claudia Reynaud has fired said Counsel and discharged them from her service.

Plaintiff wishes to call the Court's attention to the pending motion for leave to begin discovery, filed by Plaintiff on 6/10/2022 [ECF No. 10] and note that Defendant Reynaud may be hoping to achieve a 30+ day stay/delay while she is given leave to find new counsel. Plaintiff does not oppose, and actually supports, the motion of Defense Counsels to withdraw, in light of the Rules of Professional Conduct and prevailing contract law in Ohio. However, Plaintiff respectfully requests that the proceedings not be stayed, that the pending motion to open discovery is timely ruled upon, and that because of her stall tactics, delay games, ongoing destruction of evidence, and other misconduct to date, Ms. Reynaud not be given the customary 30 days within which to obtain new counsel but rather only be given 14 days¹ so as to lessen her time and opportunity for further destruction and spoliation of evidence.

Further, Ms. Reynaud, or her departing attorneys, should be required to provide good contact information for Ms. Reynaud so that Plaintiff can continue to progress the case forward and serve pleadings on Ms. Reynaud if the proceedings are not stayed or if Ms. Reynaud ultimately

¹ It would also send a message to Ms. Reynaud that she will not be rewarded with month long delays if she wants to make a habit out of firing her attorneys 21 days after their representation begins. Given Ms. Reynaud's misconduct to date, and her apparent desire to delay and stave off being made to answer discovery, if Ms. Reynaud realized she could get 30 day stays every time she fired her counsel, she would likely go through 8-12 attorneys over the next 12 months.

opts to proceed pro se or decides to stop participating in the case. Ms. Reynaud has appeared and thus is entitled to notice and service of pleadings and Plaintiff will be required to notify and serve her copies by some valid procedurally appropriate method.

WHEREFORE, Plaintiff prays that this Honorable Court will grant Defense Counsels' motion to withdraw but will require that Defense Counsel and Ms. Reynaud provide good contact information whereat Ms. Reynaud may receive electronic notice and service of filings. Further, Plaintiff prays this Honorable Court will not give Ms. Reynaud 30 days but rather a more limited time period, in light of her misconduct to date, within which to obtain new counsel.

Respectfully submitted,

REO LAW, LLC

/s/ Bryan A. Reo

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Pro Se Plaintiff and Ohio Attorney

June 13, 2022

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CERTIFICATE OF SERVICE

I, Bryan A. Reo, affirm that I am a party to the above-captioned civil action, and on June 10, 2022, I submitted this Certificate of Service, Plaintiff Bryan A. Reo's Brief in Support of Defense Counsels' Motion to Withdraw From Representation of Defendant Ludivine Joan Claudia Reynaud to the Court's Electronic Filing System, which should serve the same upon the attorneys of record for Defendant.

/s/ Bryan A. Reo

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Pro se Plaintiff

Dated: June 13, 2022